UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

ATLAS DATA PRIVACY CORPORATION, as assignee of individuals who are Covered Persons, JANE DOE-1, a law enforcement officer, JANE DOE-2, a law enforcement officer, EDWIN MALDONADO, SCOTT MALONEY, JUSTYNA MALONEY, PATRICK COLLIGAN, and WILLIAM SULLIVAN,

(Electronically Filed)

Plaintiffs,

CIVIL ACTION

v.

Civil Action No. 1:24-cv-4324

RESTORATION OF AMERICA, VOTER REFERENCE FOUNDATION LLC, RICHARD ROES 1-10, fictitious names of unknown individuals and ABC COMPANIES 1-10, fictitious names of unknown entities,

Defendants.

MOTION FOR ADMISSION PRO HAC VICE

Defendants Restoration of America and Voter Reference Foundation LLC (collectively "Defendants"), pursuant to Local Civ. Rule 101(c) hereby moves for the admission *pro hac vice* of Matthew Mueller, Esq. in the above captioned action. In support of this Motion, Defendants submit the Certification of John E. MacDonald, Esq. as well as the certification from the applicant and a proposed form of Order.

Respectfully submitted,

Dated: August 5, 2025

By: /s/John E. MacDonald
John E. MacDonald (NJ Bar No. 011511995)
CONSTANGY, BROOKS, SMITH & PROPHETE LLP
3120 Princeton Pike, Suite 301
Lawrenceville, NJ 08648
jmacdonald@constangy.com
(609) 357-1183 (tel)
(609) 844-1102 (fax)
Attorneys for Defendants